

REMARKS

The Office Action dated February 25, 2004 has been carefully reviewed and the following remarks have been made in consequence thereof.

Claims 1-18 are pending in this application. Claims 1-18 stand rejected.

The rejection of Claims 1, 4, and 13 under 35 U.S.C. § 102 as being anticipated by Rogers et al. "Rogers" (U.S. Patent 5,793,964) is respectfully traversed.

Rogers describes a web browser system that includes a web browser (130) and a control program agent (131) that is coupled to a command file server (133). Command file server (133) is coupled to a database gateway (134) for gathering information from databases located on different database servers (133'). Command file server (133) is programmed to perform web browsing functions at the request of a user to access information within an Intranet (140) and to gather information located elsewhere via the Internet.

Claim 1 recites a method for communicating aircraft and aircraft engine information using a system including a first server system and a second server system, the first server system including a first web server and a first database, the second server system including a second web server and a second database, wherein the method includes "coupling the first web server to the first database, wherein the first web server populates a first web site with data from the first database...coupling the second web server to the second database, wherein the second web server populates a second web site with data from the second database...synchronizing the first web site and the second web site to function together as a collaborative web site...accessing at least of the first web site and the second web site via a computer including a browser...selectively accessing the first web site and the data stored in the first server system database via the second server system...selectively accessing the second web site and the data stored in the second server system database via the first server system."

Rogers does not describe or suggest a method for communicating aircraft and aircraft engine information as recited in Claim 1. More specifically, Rogers does not describe or suggest a method for communicating aircraft and aircraft engine information that includes coupling a first web server to the first database, wherein the first web server populates a first

web site with data from the first database, coupling a second web server to a second database, wherein the second web server populates a second web site with data from the second database, and synchronizing the first web site and the second web site to function together as a collaborative web site. Rather, in contrast to the present invention, Rogers describes a web browser system that includes a command file server that is coupled to a database gateway for gathering information from databases located on different database servers, wherein the command file server is programmed to perform web browsing functions at the request of a user to access information within an Intranet and to gather information located elsewhere via the Internet, and does not describe or suggest synchronizing a first web site and a second web site to function as a collaborative web site.

Moreover, Rogers does not describe or suggest a method for communicating aircraft and aircraft engine information that includes selectively accessing a first web site and data stored in a first server system database via a second server system, and selectively accessing a second web site and data stored in a second server system database via a first server system. Rather, in contrast to the present invention, Rogers describes a single web browser system that includes a database gateway for gathering information from an Intranet and for gathering information located elsewhere via the Internet, and does not describe or suggest accessing a first web site via a second server system and accessing a second web site via a first server system as recited in Claim 1. Accordingly, for at least the reasons set forth above, Claim 1 is submitted to be patentable over Rogers.

Claim 4 depends from independent Claim 1. When the recitations of Claim 4 are considered in combination with the recitations of Claim 1, Applicants submit that dependent Claim 4 likewise is patentable over Rogers.

Claim 13 recites a web-based communications system including "a computer comprising a browser...a network coupled to said computer...a first server system comprising a first web server and a first database, said first web server coupled to said first database and to said network, said first web server configured to cause to be displayed at said computer a first web site populated with data from said first database...a second server system comprising a second web server and a second database, said second web server coupled to said second database and to said network, said second web server configured to cause to be displayed at said computer a second web site populated with data from said second database, said first web site and said second web site synchronized to function

together as a collaborative web site, data stored in said first server system database selectively accessible to said browser via said second server system, data stored in said second server system database is selectively accessible to said browser via said first server system."

Rogers does not describe or suggest a web-based communications system as recited in Claim 13. More specifically, Rogers does not describe or suggest a web-based communications system including a first server system that includes a first web server and a first database, the first web server coupled to the first database, wherein the first web server is configured to cause to be displayed at a computer a first web site populated with data from the first database, and a second server system that includes a second web server and a second database, the second web server coupled to the second, wherein the second web server is configured to cause to be displayed at the computer a second web site populated with data from the second database, such that the first web site and the second web site are synchronized to function together as a collaborative web site, and such that the data stored in the first server system database is selectively accessible to the browser via the second server system, and such that the data stored in the second server system database is selectively accessible to the browser via the first server system. Rather, in contrast to the present invention, Rogers describes a web browser system that includes a command file server that is coupled to a database gateway for gathering information from databases located on different database servers, wherein the command file server is programmed to perform web browsing functions at the request of a user to access information within an Intranet and to gather information located elsewhere via the Internet, and does not describe or suggest synchronizing a first web site and a second web site to function as a collaborative web site. Accordingly, for at least the reasons set forth above, Claim 13 is submitted to be patentable over Rogers

For at least the reasons set forth above, Applicants respectfully request that the Section 102 rejection of Claims 1, 4, and 13 be withdrawn.

The rejection of Claims 2-3, 5-10, 12, 14-16, and 18 under 35 U.S.C. § 103(a) as being unpatentable over Rogers in view of Garrow et al. "Garrow" (U.S. Pub. No. 2002/0194160) is respectfully traversed.

Rogers is described above. Garrow describes a system (11) for maintaining a database of configurations (52) of mechanical equipment. A functional configuration database (600) is established to store functional information about an end item and internal components of the end item. A logical configuration database (610) is established that corresponds to the functional configuration database (600). A physical configuration database (700) is established to store physical information about the end item. An operational configuration database (710) is established to store operational information about the end item. The database of configurations (52) is maintained in accordance with the functional configuration database (600), the logical configuration database (610), the physical configuration database (700) and the operational configuration database (710).

Applicants respectfully submit that the Section 103 rejection of the presently pending claims is not a proper rejection. As the Federal Circuit has recognized, obviousness is not established merely by combining references having different individual elements of pending claims. Ex parte Levengood, 28 U.S.P.Q.2d 1300 (Bd. Pat. App. & Inter. 1993). MPEP 2143.01. Rather, there must be some suggestion, outside of Applicants' disclosure, in the prior art to combine such references, and a reasonable expectation of success must be both found in the prior art, and not based on Applicant's disclosure. In re Vaeck, 20 U.S.P.Q.2d 1436 (Fed. Cir. 1991). In the present case, neither a suggestion nor motivation to combine the prior art disclosures, nor any reasonable expectation of success has been shown.

Furthermore, it is impermissible to use the claimed invention as an instruction manual or "template" to piece together the teachings of the cited art so that the claimed invention is rendered obvious. Specifically, one cannot use hindsight reconstruction to pick and choose among isolated disclosures in the art to deprecate the claimed invention. Further, it is impermissible to pick and choose from any one reference only so much of it as will support a given position, to the exclusion of other parts necessary to the full appreciation of what such reference fairly suggests to one of ordinary skill in the art. The present Section 103 rejection is based on a combination of teachings selected from multiple patents in an attempt to arrive at the claimed invention. Specifically, Rogers is cited for its teaching of a web browser system including a first web server and a second web server that each include a command file server coupled to a database gateway, wherein data stored in the first web server is accessed via the second web server, and Garrow is merely cited for its teaching of a system relating to aircraft engine manufacturers and aircraft manufacturers. Since there is no teaching nor

suggestion in the cited art for the combination, the Section 103 rejection appears to be based on a hindsight reconstruction in which isolated disclosures have been picked and chosen in an attempt to deprecate the present invention. Of course, such a combination is impermissible, and for this reason alone, Applicants request that the Section 103 rejection be withdrawn.

If art "teaches away" from a claimed invention, such a teaching supports the nonobviousness of the invention. U.S. v. Adams, 148 USPQ 479 (1966); Gillette Co. v. S.C. Johnson & Son, Inc., 16 USPQ2d 1923, 1927 (Fed. Cir. 1990). In light of this standard, it is respectfully submitted that the cited art, as a whole, is not suggestive of the presently claimed invention. More specifically, Applicants respectfully submit that the combination of Rogers and Garrow teaches away from the present invention.

Moreover, neither Rogers nor Garrow, considered alone or in combination, describe or suggest the claimed invention. Specifically, Claim 1 recites a method for communicating aircraft and aircraft engine information using a system including a first server system and a second server system, the first server system including a first web server and a first database, the second server system including a second web server and a second database, wherein the method includes "coupling the first web server to the first database, wherein the first web server populates a first web site with data from the first database...coupling the second web server to the second database, wherein the second web server populates a second web site with data from the second database...synchronizing the first web site and the second web site to function together as a collaborative web site...accessing at least one of the first web site and the second web site via a computer including a browser...selectively accessing the first web site and the data stored in the first server system database via the second server system...selectively accessing the second web site and the data stored in the second server system database via the first server system."

Neither Rogers nor Garrow, considered alone or in combination, describe or suggest a method for communicating aircraft and aircraft engine information as recited in Claim 1. More specifically, neither Rogers nor Garrow, considered alone or in combination, describe or suggest a method for communicating aircraft and aircraft engine information that includes coupling a first web server to the first database, wherein the first web server populates a first web site with data from the first database, coupling a second web server to a second database, wherein the second web server populates a second web site with data from the second database, synchronizing the first web site and the second web site to function together as a

collaborative web site, selectively accessing a first web site and data stored in a first server system database via a second server system, and selectively accessing a second web site and data stored in a second server system database via a first server system. Rather, in contrast to the present invention, Rogers describes a web browser system that includes a command file server that is coupled to a database gateway for gathering information from databases located on different database servers, wherein the command file server is programmed to perform web browsing functions at the request of a user to access information within an Intranet and to gather information located elsewhere via the Internet, and as such, Rogers does not describe nor suggest synchronizing a first web site and a second web site to function together as a collaborative web site, and Garrow describes a system for maintaining a database of configurations of mechanical equipment. Accordingly, for at least the reasons set forth above, Claim 1 is submitted to be patentable over Rogers in view of Garrow.

Claims 2-3 and 5 depend from independent Claim 1. When the recitations of Claims 2-3 and 5 are considered in combination with the recitations of Claim 1, Applicants submit that dependent Claims 2-3 and 5 likewise is patentable over Rogers in view of Garrow.

Claim 6 recites a system for communicating aircraft and aircraft engine information to a user via a computer including a browser, wherein the system includes “a first server system comprising a first web server and a first database, said first web server coupled to said first database, said first web server configured to cause to be displayed at the user computer a first web site populated with data from said first database...a second server system comprising a second web server and a second database, said second web server coupled to said second database, said second web server configured to cause to be displayed at the user computer a second web site populated with data from said second database, said first web site and said second web site synchronized to function together as a collaborative web site, data stored in said first server system database accessible to the user browser via said second server system, data stored in said second server system database accessible to the user browser via said first server system.”

Neither Rogers nor Garrow, considered alone or in combination, describe or suggest a system for communicating aircraft and aircraft engine information as recited in Claim 6. More specifically, neither Rogers nor Garrow, considered alone or in combination, describe or suggest a system for communicating aircraft and aircraft engine information that includes a first server system including a first web server and a first database, wherein the first web

server is configured to cause to be displayed at the user computer a first web site populated with data from the first database, and a second server system comprising a second web server and a second database, wherein the second web server is configured to cause to be displayed at the user computer a second web site populated with data from the second database, wherein the first web site and the second web site are synchronized to function together as a collaborative web site, such that data stored in the first server system database is accessible to the user browser via the second server system, and such that data stored in the second server system database is accessible to the user browser via the first server system. Rather, in contrast to the present invention, Rogers describes a web browser system that includes a command file server that is coupled to a database gateway for gathering information from databases located on different database servers, wherein the command file server is programmed to perform web browsing functions at the request of a user to access information within an Intranet and to gather information located elsewhere via the Internet, and as such, Rogers does not describe nor suggest synchronizing a first web site and a second web site to function together as a collaborative web site, and Garrow describes a system for maintaining a database of configurations of mechanical equipment. Accordingly, for at least the reasons set forth above, Claim 6 is submitted to be patentable over Rogers in view of Garrow.

Claims 7-10 depend from independent Claim 6. When the recitations of 7-10 are considered in combination with the recitations of Claim 6, Applicants submit that dependent Claims 7-10 likewise is patentable over Rogers in view of Garrow.

Claim 12 recites a database structure configured to be protected from access by unauthorized individuals, wherein the database structure includes “a first database and a second database, said first database coupled to a first server system hosted by an aircraft engine manufacturer, said second database coupled to a second server system hosted by a business partner of the aircraft engine manufacturer, at least one of said first database and said second database including information relating to at least one of general information, plans and schedules, propulsion systems, and engineering, said first database linked to a first web site configured to be populated with data from said first database, said second database linked to a second web site configured to be populated from said second database, said first web site and said second web site synchronized to function together as a collaborative web site.”

Neither Rogers nor Garrow, considered alone or in combination, describe or suggest a database structure as recited in Claim 12. More specifically, neither Rogers nor Garrow, considered alone or in combination, describe or suggest a database structure that includes a first database linked to a first web site configured to be populated with data from the first database, a second database linked to a second web site configured to be populated from the second database, wherein the first web site and the second web site are synchronized to function as a collaborative web site. Rather, in contrast to the present invention, Rogers describes a web browser system that includes a command file server that is coupled to a database gateway for gathering information from databases located on different database servers, wherein the command file server is programmed to perform web browsing functions at the request of a user to access information within an Intranet and to gather information located elsewhere via the Internet, and as such, Rogers does not describe nor suggest synchronizing a first web site and a second web site to function together as a collaborative web site, and Garrow describes a system for maintaining a database of configurations of mechanical equipment. Accordingly, for at least the reasons set forth above, Claim 12 is submitted to be patentable over Rogers in view of Garrow.

Claim 13 recites a web-based communications system including "a computer comprising a browser...a network coupled to said computer...a first server system comprising a first web server and a first database, said first web server coupled to said first database and to said network, said first web server configured to cause to be displayed at said computer a first web site populated with data from said first database...a second server system comprising a second web server and a second database, said second web server coupled to said second database and to said network, said second web server configured to cause to be displayed at said computer a second web site populated with data from said second database, said first web site and said second web site synchronized to function together as a collaborative web site, data stored in said first server system database selectively accessible to said browser via said second server system, data stored in said second server system database is selectively accessible to said browser via said first server system."

Neither Rogers nor Garrow, considered alone or in combination, describe or suggest a web-based communications system as recited in Claim 13. More specifically, neither Rogers nor Garrow, considered alone or in combination, describe or suggest a web-based

communications system including a first server system that includes a first web server and a first database, the first web server coupled to the first database, wherein the first web server is configured to cause to be displayed at a computer a first web site populated with data from the first database, and a second server system that includes a second web server and a second database, the second web server coupled to the second, wherein the second web server is configured to cause to be displayed at the computer a second web site populated with data from the second database, such that the first web site and the second web site are synchronized to function as a collaborative web site, and such that the data stored in the first server system database is selectively accessible to the browser via the second server system, and such that the data stored in the second server system database is selectively accessible to the browser via the first server system. Rather, in contrast to the present invention, Rogers describes a web browser system that includes a command file server that is coupled to a database gateway for gathering information from databases located on different database servers, wherein the command file server is programmed to perform web browsing functions at the request of a user to access information within an Intranet and to gather information located elsewhere via the Internet, and as such, Rogers does not describe nor suggest synchronizing a first web site and a second web site to function together as a collaborative web site, and Garrow describes a system for maintaining a database of configurations of mechanical equipment. Accordingly, for at least the reasons set forth above, Claim 13 is submitted to be patentable over Rogers in view of Garrow.

Claims 14-16 and 18 depend from independent Claim 13. When the recitations of Claims 14-16 and 18 are considered in combination with the recitations of Claim 13, Applicants submit that dependent Claims 14-16 and 18 likewise is patentable over Rogers in view of Garrow.

For the reasons set forth above, Applicants request that the Section 103 rejection of Claims 2-3, 5-10, 12, 14-16, and 18 be withdrawn.

The rejection of Claims 11 and 17 under 35 U.S.C. § 103(a) as being unpatentable over Rogers in view of Garrow and further in view of Glass et al. "Glass" (U.S. Patent 6,278,965) is respectfully traversed.

Rogers and Garrow are described above. Glass describes a real-time data management system which uses data generated at different rates, by multiple heterogeneous

incompatible data sources, such as an airport surface traffic data management system that electronically interconnects air traffic control, airline, and airport operations user communities to facilitate information sharing and improve taxi queuing using an expert system to fuse data from a variety of airline, airport operations, ramp control, and air traffic control sources, in order to establish, predict, and update reference data values for every aircraft surface operation.

Applicants respectfully submit that the Section 103 rejection of the presently pending claims is not a proper rejection. As the Federal Circuit has recognized, obviousness is not established merely by combining references having different individual elements of pending claims. Ex parte Levingood, 28 U.S.P.Q.2d 1300 (Bd. Pat. App. & Inter. 1993). MPEP 2143.01. Rather, there must be some suggestion, outside of Applicants' disclosure, in the prior art to combine such references, and a reasonable expectation of success must be both found in the prior art, and not based on Applicant's disclosure. In re Vaeck, 20 U.S.P.Q.2d 1436 (Fed. Cir. 1991). In the present case, neither a suggestion nor motivation to combine the prior art disclosures, nor any reasonable expectation of success has been shown.

Furthermore, it is impermissible to use the claimed invention as an instruction manual or "template" to piece together the teachings of the cited art so that the claimed invention is rendered obvious. Specifically, one cannot use hindsight reconstruction to pick and choose among isolated disclosures in the art to deprecate the claimed invention. Further, it is impermissible to pick and choose from any one reference only so much of it as will support a given position, to the exclusion of other parts necessary to the full appreciation of what such reference fairly suggests to one of ordinary skill in the art. The present Section 103 rejection is based on a combination of teachings selected from multiple patents in an attempt to arrive at the claimed invention. Specifically, Rogers is cited for its teaching of a web browser system including a first web server and a second web server that each include a command file server coupled to a database gateway, wherein data stored in the first web server is accessed via the second web server, and Garrow is merely cited for its teaching of a system relating to aircraft engine manufacturers and aircraft manufacturers, and Glass is merely cited for its teaching of at least one of the first and second databases maintaining a record of navigation changes. Since there is no teaching nor suggestion in the cited art for the combination, the Section 103 rejection appears to be based on a hindsight reconstruction in which isolated disclosures have been picked and chosen in an attempt to deprecate the present invention. Of

course, such a combination is impermissible, and for this reason alone, Applicants request that the Section 103 rejection be withdrawn.

If art "teaches away" from a claimed invention, such a teaching supports the nonobviousness of the invention. U.S. v. Adams, 148 USPQ 479 (1966); Gillette Co. v. S.C. Johnson & Son, Inc., 16 USPQ2d 1923, 1927 (Fed. Cir. 1990). In light of this standard, it is respectfully submitted that the cited art, as a whole, is not suggestive of the presently claimed invention. More specifically, Applicants respectfully submit that the combination of Rogers, Garrow, and Glass teaches away from the present invention.

Moreover, no combination of Rogers, Garrow, and Glass, considered alone or in combination, describe or suggest the claimed invention. Specifically, Claim 6 recites a system for communicating aircraft and aircraft engine information to a user via a computer including a browser, wherein the system includes "a first server system comprising a first web server and a first database, said first web server coupled to said first database, said first web server configured to cause to be displayed at the user computer a first web site populated with data from said first database...a second server system comprising a second web server and a second database, said second web server coupled to said second database, said second web server configured to cause to be displayed at the user computer a second web site populated with data from said second database, said first web site and said second web site synchronized to function together as a collaborative web site, data stored in said first server system database accessible to the user browser via said second server system, data stored in said second server system database accessible to the user browser via said first server system."

None of Rogers, Garrow, and Glass, considered alone or in combination, describe or suggest a system for communicating aircraft and aircraft engine information as recited in Claim 6. More specifically, none of Rogers, Garrow, and Glass, considered alone or in combination, describe or suggest a system for communicating aircraft and aircraft engine information that includes a first server system including a first web server and a first database, wherein the first web server is configured to cause to be displayed at the user computer a first web site populated with data from the first database, and a second server system comprising a second web server and a second database, wherein the second web server is configured to cause to be displayed at the user computer a second web site populated with data from the second database, wherein the first web site and the second web site are

synchronized to function as a collaborative web site, such that data stored in the first server system database is accessible to the user browser via the second server system, and such that data stored in the second server system database is accessible to the user browser via the first server system. Rather, in contrast to the present invention, Rogers describes a web browser system that includes a command file server that is coupled to a database gateway for gathering information from databases located on different database servers, wherein the command file server is programmed to perform web browsing functions at the request of a user to access information within an Intranet and to gather information located elsewhere via the Internet, and as such, Rogers does not describe nor suggest synchronizing a first web site and a second web site to function together as a collaborative web site, and Garrow describes a system for maintaining a database of configurations of mechanical equipment, and Glass describes a system to fuse data from a variety of airline, airport operations, ramp control, and air traffic control sources, in order to establish, predict, and update reference data values for every aircraft surface operation. Accordingly, for at least the reasons set forth above, Claim 6 is submitted to be patentable over Rogers in view of Garrow and further in view of Glass.

Claim 11 depends from independent Claim 6. When the recitations of Claim 11 are considered in combination with the recitations of Claim 6, Applicants submit that dependent Claim 11 likewise is patentable over Rogers in view of Garrow and further in view of Glass.

Claim 13 recites a web-based communications system including "a computer comprising a browser...a network coupled to said computer...a first server system comprising a first web server and a first database, said first web server coupled to said first database and to said network, said first web server configured to cause to be displayed at said computer a first web site populated with data from said first database...a second server system comprising a second web server and a second database, said second web server coupled to said second database and to said network, said second web server configured to cause to be displayed at said computer a second web site populated with data from said second database, said first web site and said second web site synchronized to function together as a collaborative web site, data stored in said first server system database selectively accessible to said browser via said second server system, data stored in said second server system database is selectively accessible to said browser via said first server system."

None of Rogers, Garrow, and Glass, considered alone or in combination, describe or suggest a web-based communications system as recited in Claim 13. More specifically, none of Rogers, Garrow, and Glass, considered alone or in combination, describe or suggest a web-based communications system that includes a first web server and a first database, the first web server coupled to the first database, wherein the first web server is configured to cause to be displayed at a computer a first web site populated with data from the first database, and a second server system that includes a second web server and a second database, the second web server coupled to the second, wherein the second web server is configured to cause to be displayed at the computer a second web site populated with data from the second database, such that the first web site and the second web site are synchronized to function as a collaborative web site, and such that the data stored in the first server system database is selectively accessible to the browser via the second server system, and such that the data stored in the second server system database is selectively accessible to the browser via the first server system. Rather, in contrast to the present invention, Rogers describes a web browser system that includes a command file server that is coupled to a database gateway for gathering information from databases located on different database servers, wherein the command file server is programmed to perform web browsing functions at the request of a user to access information within an Intranet and to gather information located elsewhere via the Internet, and as such, Rogers does not describe nor suggest synchronizing a first web site and a second web site to function together as a collaborative web site, and Garrow describes a system for maintaining a database of configurations of mechanical equipment, and Glass describes a system to fuse data from a variety of airline, airport operations, ramp control, and air traffic control sources, in order to establish, predict, and update reference data values for every aircraft surface operation. Accordingly, for at least the reasons set forth above, Claim 13 is submitted to be patentable over Rogers in view of Garrow and further in view of Glass.

Claim 17 depends from independent Claim 13. When the recitations of Claim 17 are considered in combination with the recitations of Claim 13, Applicants submit that dependent Claim 17 likewise is patentable over Rogers in view of Garrow and further in view of Glass.

For the reasons set forth above, Applicants request that the Section 103 rejection of Claims 11 and 17 be withdrawn.

In view of the foregoing amendments and remarks, all the claims now active in this application are believed to be in condition for allowance. Reconsideration and favorable action is respectfully solicited.

Respectfully Submitted,



William J. Zychlewicz
Registration No. 51,366
ARMSTRONG TEASDALE LLP
One Metropolitan Square, Suite 2600
St. Louis, Missouri 63102-2740
(314) 621-5070